

CSD 1183 [12/01/23]

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UNITED STATES BANKRUPTCY COURT
 SOUTHERN DISTRICT OF CALIFORNIA
 325 West F Street, San Diego, California 92101-6991

In Re
 Ronald James Berry

BANKRUPTCY NO. 24-01691-CL7

Tax I.D.(EIN)# /S.S.#:XXX-XX-4347

Debtor(s)

NOTICE OF HEARING AND MOTION

TO: Honorable and Residing Chief Bankruptcy Court Judge Christopher B Latham, Christopher R. Barclay, Chapter 7 trustee, Richard Charles Berry, Judgment Creditor, and all parties of interest

You are hereby notified that on 7/8/2024, at 10:00 a.m., in Department 1, Room 218 of the Jacob Weinberger United States Courthouse, located at 325 West F Street, San Diego, California 92101-6991, there will be a hearing regarding the motion of Ronald James Berry, Movant, for Motion to Avoid Judicial Lien on Real Estate Pursuant to 11 U.S.C. 522(f)

Any opposition or other response to this motion must be served upon the undersigned and the original and one copy of such papers with proof of service must be filed with the Clerk of the U.S. Bankruptcy Court at 325 West F Street, San Diego, California 92101-6991, **not later than fourteen (14)¹ days from the date of service.**

DATED: May 29, 2024

/s/ Shawn Anthony Doan
 [Attorney for] Moving Party

¹ Depending on how you were served, you may have additional time for response. See FRBP 9006.

CSD 1183 (Page 2) [12/01/23]

CERTIFICATE OF SERVICE

I, the undersigned whose address appears below, certify:

That I am, and at all relevant times was, more than 18 years of age;

That on 29 day of May, 2024, I served a true copy of the within NOTICE OF MOTION AND HEARING, together with the following pleadings [describe any other papers]: on the following persons listed below by the mode of service shown below:

List additional papers:

Motion to Avoid Judicial Lien, Declaration of Debtor in Support of Motion to Avoid Judicial Lien

1. To Be Served by the Court via Notice of Electronic Filing ("NEF"):

Under controlling Local Bankruptcy Rules(s) ("LBR"), the document(s) listed above will be served by the court via NEF and hyperlink to the document. On 5/29/2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the e-mail address(es) indicated and/or as checked below:

☐ Attorney for Debtor (or Debtor), (if required):

☒ Chapter 7 Trustee: Christopher R. Barclay
admin@crb7trustee.com,
mlcunanan@crb7trustee.com; QCRBARCLAY2@ecf.axosfs.com

☒ For Chpt. 7, 11, & 12 cases:

☐ For Chapter 13 cases assigned to:

UNITED STATES TRUSTEE
ustp.region15@usdoj.gov

MICHAEL KOCH, TRUSTEE
mkoch@ch13.sdcoxmail.com

2. Served by United States Mail:

On 5/29/2024, I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing accurate copies in a sealed envelope in the United States Mail via 1) first class, postage prepaid or 2) certified mail with receipt number, addressed as follows:

Judgment Creditor:
Richard Charles Berry
20230 Bright Wing Trail
Colorado Springs, CO 80908

Attorney for Judgment Creditor:
James A Long, Esq
TYLER & BURSCH, LLP
24910 Las Brisas Road, Suite 110
Murrieta, CA 92562

CSD 1183 (Page 3) [12/01/23]

☐ Attorney for Debtor (or Debtor), if required:

3. Served by Personal Delivery, Facsimile Transmission, Overnight Delivery or Electronic Mail:

Under Fed.R.Civ.P.5 and controlling LBR, on _____, I served the following person(s) and/or entity(ies) by personal delivery, or (for those who consented in writing to such service method), by facsimile transmission, by overnight delivery and/or electronic mail as follows:

☐ Attorney for Debtor (or Debtor), if required:

I declare under penalty of perjury under the laws of the United States of America that the statements made in this proof of service are true and correct.

Executed on May 29, 2024
(Date)

/s/ Shawn Anthony Doan
Shawn Anthony Doan 202860
Doan Law Office
312 S. Juniper St.
Suite 101
Escondido, CA 92025

Address